

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DANIELS JAMES BUMPAS)
)
)
Plaintiffs,)
v.) Case No. 20-cv-01591
)
THOMAS DART, SHERIFF OF COOK) Judge Andrea R. Wood
COUNTY, BILQIS JACOBS-EL,)
DIRECTOR, COOK COUNTY)
DEPARTMENT OF FACILITIES)
MANAGEMENT, NNEKA JONES TAPIA,)
EXECUTIVE DIRECTOR, AND COOK)
COUNT DEPARTMENT OF)
CORRECTIONS,)
)

Defendant.

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Plaintiff, Daniels James Bumpas, ("Plaintiff"), by and through his undersigned court-appointed counsel, moves this Court for leave to file its Second Amended Complaint. In support thereof, Plaintiff states as follows:

1. On March 4, 2020, Plaintiff filed his Complaint, *pro se.*, against Cook County Criminal Courts and Cook County Jail.
2. Plaintiff's Complaint was filed in connection with his confinement at Cook County Jail between February 6, 2020 – March 3, 2020.
3. On October 19, 2020, this Court requested Attorney Ryan T. Johnson of Robbins, Salomon & Patt, Ltd. to represent Plaintiff in accordance with counsel's trial bar commitment under Local Rule 83.37 (N.D. Ill.).

4. On December 15, 2020, this Court granted Plaintiff's motion for leave to file its First Amended Complaint.

5. On April 30, 2021, Plaintiff filed his First Amended Complaint naming as Defendants Thomas Dart, Sheriff of Cook County, Bilqis Jacobs-El, Direct, Cook County Department of Facilities Management, and Nneka Jones Tapia, Executive Director, Cook County Department of Corrections.

6. On August 24, 2021, Defendant Bilqis Jacobs-El filed a motion to dismiss Plaintiff's First Amended Complaint.

7. On August 27, 2021, Defendant Thomas Dart filed a motion to dismiss Plaintiff's First Amended Complaint.

8. In effort to avoid extended motion practice and to add additional facts and allegations to Plaintiff's claims, Plaintiff requests leave from this Court to file its Second Amended Complaint.

9. Plaintiff's counsel has had recent difficulty reaching their client and therefore request 35 days to file their Second Amended Complaint.

10. On September 21, 2021, Ryan T. Johnson (Counsel for Plaintiff) spoke with Miguel E. Larios (Counsel for Defendant Jacob-El) and Briana Leatherberry (Counsel for Defendant Dart) who both agreed, without objection, to Plaintiff's motion for leave to file its Second Amended Complaint.

WHEREFORE, Plaintiff requests 35-days leave from this Court to file its Second Amended Complaint.

Respectfully submitted,

Daniels James Bumpas

By: /s/ Ryan T. Johnson
One of His Attorneys

Ryan T. Johnson (ARDC # 6280298)

Email: rjohnson@rsplaw.com

Andrés J. Gallegos II (ARDC # 6337849)

Email: agallegosii@rsplaw.com

Attorneys for Plaintiff

ROBBINS, SALOMON & PATT, LTD.

180 N. LaSalle Street, Ste. 3300

Chicago, IL 60601

Ph: (312) 782-9000

Fax: (312) 782-6900

CERTIFICATE OF SERVICE

The undersigned, under penalty of perjury pursuant to 28 U.S.C. § 1746 certifies that on September 23, 2021 he filed the foregoing

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

through the Court's CM/ECF system.

/s/ Ryan T. Johnson _____